

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X

TARASIK ABDELL, et al.,

Plaintiffs, **RULE 68 OFFER OF  
JUDGMENT**

-against-

05 CV 8453 (KMK) (JCF)

THE CITY OF NEW YORK; MICHAEL  
BLOOMBERG, Mayor of the City of New York,  
RAYMOND KELLY, Commissioner of the New York  
City Police Department, TERRENCE MONAHAN,  
Assistant Chief of the New York City Police  
Department, and JOHN and JANE DOES,

Defendants.

----- X

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant City of New York hereby offers to allow each and every plaintiff identified in Exhibit A attached hereto to take judgment against it in this action for the sum of TWO THOUSAND FIVE HUNDRED AND ONE (\$2,501.00) DOLLARS, plus that plaintiff's pro rata apportionment of the reasonable attorneys' fees and costs to the date of this offer.

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant City of New York hereby offers to allow each and every plaintiff identified in Exhibit B attached hereto to take judgment against it in this action for the sum of FIVE THOUSAND AND ONE (\$5,001.00) DOLLARS, plus that plaintiff's pro rata apportionment of the reasonable attorneys' fees and costs to the date of this offer.

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, defendant City of New York hereby offers to allow each and every plaintiff identified in Exhibit C attached hereto to take judgment against it in this action for the sum of SEVEN THOUSAND FIVE HUNDRED AND ONE (\$7,501.00) DOLLARS, plus that plaintiff's pro rata apportionment of the reasonable attorneys' fees and costs to the date of this offer.

This judgment shall be in full satisfaction of all claims or rights that the accepting plaintiff may have to damages, or any other form of relief, arising out of the alleged acts or omissions of defendants City of New York, Michael Bloomberg, Raymond Kelly and Terrence Monahan and any official or employee, either past or present, of the City of New York, or any agency thereof, including but not limited to the New York City Health and Hospitals Corporation, and the Hudson River Park Trust, in connection with the facts and circumstances that are the subject of this action.


This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure, and is not to be construed as an admission of liability by any defendant, official or employee of the City of New York, or any agency thereof; nor is it an admission that the accepting plaintiff has suffered any damages.

Acceptance of this offer of judgment will act to release and discharge all defendants, their successors and assigns, and all past and present officials, employees, representatives and agents of the City of New York, or any agency thereof, including but not limited to the New York City Health and Hospitals Corporation, and the Hudson River Park Trust, from any and all claims that were or could have been alleged by the accepting plaintiff in the above-referenced action. Acceptance of this offer of judgment will also operate to waive the accepting plaintiff's right to a claim for interest on the amount of the judgment. The judgment shall contain and recite the terms and conditions set forth herein.

Dated: New York, New York  
March 6, 2006

MICHAEL A. CARDOZO  
Corporation Counsel of the  
City of New York  
Attorneys for defendants  
100 Church Street, Room 3-135  
New York, New York 10007  
212-788-8342

By:

  
Jeffrey A. Dougherty (JD 5224)  
Special Assistant Corporation Counsel  
Special Federal Litigation Division

BY HAND TO: Michael L. Spiegel, Esq.  
111 Broadway, Suite 1305  
New York, New York 10006  
Attorney for plaintiffs

**EXHIBIT A**

<b>Name of Plaintiff</b>	<b>Rule 68 Offer of Judgment</b>
Abdell, Tarasik	\$2,501
Amato, Joseph	\$2,501
Barfield, Ellen	\$2,501
Barrows, David	\$2,501
Becker, Michael	\$2,501
Beeny, Diana	\$2,501
Behling, John	\$2,501
Benn, Ruth	\$2,501
Bhalla, Arvin	\$2,501
Burns, Daniel	\$2,501
Capps, Linnea	\$2,501
Church, Mark	\$2,501
Colville, Mark	\$2,501
Conwell, William	\$2,501
Cook, Colleen	\$2,501
Csonstos, Richard	\$2,501
Davis, Felton	\$2,501
Demott, Peter	\$2,501
Dickerson, Dewayne	\$2,501
Dietzen, Matthew	\$2,501
Doggett, Lois	\$2,501
Dorias, Jason	\$2,501
Drummond, Alexander	\$2,501
Ekberg, Steveb	\$2,501
Evans, Calla	\$2,501
Feinstein, Adam	\$2,501
Flynn, James	\$2,501
Gale, Howard	\$2,501
Gamboa, Stephen	\$2,501
Gaster, Gabriel	\$2,501
Gaster, Tobiah	\$2,501
Goldberg, Charles	\$2,501
Goeckler, Thomas	\$2,501
Gordon, David	\$2,501
Gordon, Kathy	\$2,501
Gross, Barrett	\$2,501
Gwsborg, Zoe	\$2,501
Hernandez, Kathleen	\$2,501
Hill, Roger	\$2,501
Hottle, Ryan	\$2,501
Howe, Janet	\$2,501
Hunt, Ben	\$2,501
Hutchkiss, Edward	\$2,501
Iannucci, Rochelle	\$2,501
Ivors, Tom	\$2,501
Jenkins, Dwight	\$2,501

Name of Plaintiff	Rule 68 Offer of Judgment
Joseph, Michael	\$2,501
Judd, Pepper	\$2,501
Kantor, Jay	\$2,501
Kavanagh, Brian	\$2,501
Kinane, Ed	\$2,501
Kocek, Matthew	\$2,501
Kressly, Laura	\$2,501
Lakem, Andrew	\$2,501
Lalonde, Tessa	\$2,501
Lanctot, Jared	\$2,501
Larson, Richard	\$2,501
Lavson, Jason	\$2,501
Liptay, Steve	\$2,501
Logan, Jonathan	\$2,501
Marx, Joy	\$2,501
Meisinger, Barbara	\$2,501
Migliore, Tristan	\$2,501
Miller, Zachery	\$2,501
Minervini, Robert	\$2,501
Murray, Chris	\$2,501
Nechay, Mark	\$2,501
Noonan, James	\$2,501
O'Leary, Anthony	\$2,501
O'Reillyrowe, Daniel	\$2,501
Owen, Michael	\$2,501
Palmer, Michael	\$2,501
Pardew, Christine	\$2,501
Paris, Lawrence	\$2,501
Parry, Nathaniel	\$2,501
Petrello, Shannon	\$2,501
Petrick, Stephen	\$2,501
Raymond, Laura	\$2,501
Renwick, Bruce	\$2,501
Richins, Adam	\$2,501
Rigby, Shana	\$2,501
Riverbend, Dana	\$2,501
Robinson, Raymond	\$2,501
Rochfort, Lambert	\$2,501
Rosenberg, Ronald	\$2,501
Rueckner, Devon	\$2,501
Sanchez, Frankie	\$2,501
Sanmarchi, Rondald	\$2,501
Scofield, Steven	\$2,501
Seniba, Anais	\$2,501
Sensiba, Gordon	\$2,501
Siegel, Robert	\$2,501
Spritzer, Selma	\$2,501
Stephens, Mora	\$2,501
Stlawrence, Andrew	\$2,501

Name of Plaintiff	Rule 68 Offer of Judgment
Swink, Theresa	\$2,501
Taylor, Hannah	\$2,501
Testa, Emily	\$2,501
Trinkl, John	\$2,501
Trudell, Ann	\$2,501
Turner, Christy	\$2,501
Valente, Johanna	\$2,501
Volpe, Patrick	\$2,501
Vreelan, Zak	\$2,501
Walker, Frantz	\$2,501
White, James	\$2,501
Wieland, Patricia	\$2,501
Wilson, James	\$2,501
Wright, Matthew	\$2,501
Wu, Roussa	\$2,501
Zambeck, Thomas	\$2,501

**EXHIBIT B**

<b>Name of Plaintiff</b>	<b>Rule 68 Offer of Judgment</b>
Ashbeck, Gary	\$5,001
Bernard, Benjamin	\$5,001
Burick, Kathleen	\$5,001
Catchpole, Thomas	\$5,001
Cavanhagh, Joan	\$5,001
Cohen, Jeff	\$5,001
Davies, Polly	\$5,001
Debruhi, Patricia	\$5,001
Ditman, Walter	\$5,001
Dornellas, Susan	\$5,001
Gibbons, Edward	\$5,001
Glick, John	\$5,001
Hedemann, Edmund	\$5,001
Janney, Jennifer	\$5,001
Kern, Kimberly	\$5,001
Knapp, Joshua	\$5,001
Krassan, Katherine	\$5,001
Miller, John	\$5,001
Nicinski, Blossom	\$5,001
Parrott, Daniel	\$5,001
Schenning, Matt	\$5,001
Williamson, James	\$5,001
Wilson, Teran	\$5,001
Wong, Jennifer	\$5,001

**EXHIBIT C**

<b>Name of Plaintiff</b>	<b>Rule 68 Offer of Judgment</b>
Crane, Susan	\$7,501
Goldenberg, Oren	\$7,501
Hardie, Richard	\$7,501
Jameson, Melissa	\$7,501
Kanuse, Sarah	\$7,501
Levison, Mike	\$7,501
Lovecchio, Masielle	\$7,501
McGee, Ryan	\$7,501
Paterson, Jeffrey	\$7,501
Poe, Katherine	\$7,501
Reedsanchez, Edwin	\$7,501
Tepsic, Sarah	\$7,501



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**Defendants.**

**RULE 68 OFFER OF JUDGMENT**

**MICHAEL A. CARDOZO**  
**Corporation Counsel of the City of New York**  
**Attorney for defendants**  
**100 Church Street**  
**New York, N.Y. 10007**  
**Of Counsel: Jeffrey A. Dougherty**

**Tel: (212) 788-8342**  
**NYCLIS No. 05 SF 022702**

***Due and timely service by FACSIMILE and  
FIRST CLASS MAIL is hereby admitted.***

***New York, New York March 6, 2006***

***Jeffrey A. Dougherty, Esq.***

***Attorney for defendants***